

2. Do any of you have any opinions regarding this case based on the nature of the allegations that would prevent you from being impartial?

A. Knowledge of Litigants or Counsel

3. Please state whether you know, or have had any dealings, directly or indirectly, with any of the following individuals or any member of their families, or any of the following entities:

- a. Robert Bagley
- b. JPMorgan Chase
- c. Milton Williams, Jr., Jeremiah Iadevaia, or any members or employees of Vladeck, Waldman, Elias & Engelhard, P.C.
- d. Robert Whitman, John DiNapoli, or any members or employees of Seyfarth Shaw LLP
- e. Stacey L. Blecher or any employees of JPMorgan Chase's Legal & Compliance Department
- f. Letsie Bagley
- g. Eric Carr
- h. Marie Gallicchio
- i. Debbie Giles
- j. Mariela Recio
- k. Charles Rossotto
- l. Willetta Shepherd Rucker
- m. Anthony Tufano
- n. Rosalind Trines

o. Jennifer Wheatley

4. As you look around this room, do any of you recognize any friends or acquaintances among the other potential jurors?

B. General Responsibilities and Duties of Jurors

5. Do any of you have any difficulty reading or understanding English?
6. Do any of you have any physical problem that would interfere with your ability to serve on the jury?
7. Do any of you have any problems at home or at work that might interfere with your ability to concentrate on this case during trial, or to act impartially as a juror?
8. As a result of any of your life experiences, do any of you believe there is anything that would cause you to lean in favor of either party in this case?
9. Do any of you have any religious, moral, philosophical, or other belief that would prevent you from passing judgment on another person?
10. This trial is expected to last for five days. Is there anything about the length or scheduling of the trial that would interfere with your ability to serve?

C. Corporate Status

11. Do any of you feel sympathetic to or allied with persons who bring proceedings against corporations or other institutions in the courts or elsewhere?
12. Do you think such individuals are troublemakers?
13. Some of the witnesses who will be testifying in this case are current or former employees of the defendant. Would any of you be less likely to believe sworn testimony from the defendant's current or former employees?

III. INDIVIDUALS QUESTIONS FOR EACH JUROR

A. Work Background

14. Where do you work?
 - a. If unemployed, how long and under what circumstances did you become unemployed?
 - b. If retired, at what age did you retire?
 - i. Under what circumstances did you retire (e.g., voluntary, involuntary, layoffs)?
15. How long have you worked there?
16. What is your job title?
17. What type of work do you do?
18. Do you like your job?
19. Do you now, or have you ever, supervised people?
 - a. If so, how many people do/did you supervise?
 - b. Have you ever had to discipline an employee?
 - c. Have you ever made the decision or recommendation to terminate someone's employment?
20. Is your spouse, if any, employed?
 - a. If so, where?
 - b. What job?
 - c. Does or did your spouse supervise people?
 - i. If so, how many people does/did your spouse supervise.
 - ii. Did your spouse ever make the decision or recommendation to terminate someone's employment?

- d. What did your spouse or partner do before that job?
 - e. If unemployed, how long and under what circumstances did you become unemployed?
 - f. How long have you been married?
21. Do you have working children?
- a. If so, where?
 - b. What job or jobs?
 - c. How long has your child been employed there?
 - d. What did your child do before that?
22. Are there any other adults who live with you who work?
- a. If so, where do they work?
 - b. What job or jobs do they do?
23. Have you worked for any corporations?
- a. If so, which corporations?
24. Do you have any experience running your own business?
- a. If so, please describe that business.
25. Have you ever belonged to a labor union?
- a. If yes, did you have any position with the union such as a shop steward?
 - b. Did you leave the union?
 - i. If so, why?

B. Educational Background

26. Please describe your educational background.
27. Do you have any certifications or licenses?

28. Have you had any special training or taken any courses relating to law?
 - a. If so, what training and courses?
29. Have you had any special training, education, or experience in personnel or human resources matters?
 - a. If so, please describe.
30. Have you ever had a job in the field of human resources?
 - a. If so, explain your job duties or role.

C. Attitudes About Discrimination and Work

31. Have you or someone close to you ever witnessed or experienced discrimination, harassment, or retaliation in the workplace?
 - a. If so, please describe the discrimination, harassment, or retaliation.
 - b. Was an internal complaint filed?
 - c. How was the situation handled?
 - d. What was the outcome?
32. Have you or someone close to you ever sued an employer or filed a grievance against an employer?
 - a. If so, in what court, government agency, or other forum?
 - b. What was the basis of the lawsuit or grievance?
 - c. What was the outcome?
33. Have you or someone close to you ever been accused of discrimination, harassment, or retaliation in the workplace, either by a complaint made within the employing company, through an administrative agency, or a lawsuit?
 - a. Is so, please describe the complaint.

- b. How was the complaint handled, if at all, by the employer?
 - c. What was the outcome?
- 34. Have you ever had a dispute with your employer about something other than allegations of discrimination, harassment, or retaliation?
 - a. If so, what was it about and how was it resolved?
- 35. Have you ever been terminated from your employment?
 - a. If so, when?
 - b. Did you receive a warning before being terminated?
 - i. If so, was it a written or verbal warning?
 - c. Did you think that your termination was unfair?
- 36. Has one of your family members or close friends ever been terminated from his or her employment?
 - a. If so, when?
 - b. What were the reasons?
 - c. Did this person receive a warning before being terminated?
 - d. If so, was it a written or verbal warning?

D. Prior Civil Litigation Experience

- 37. Have you or any member of your family been a party to a lawsuit?
 - a. If so, were you suing or being sued?
 - b. Who was the other party?
 - c. Was the matter resolved?
 - i. If so, how long ago did this happen?
 - d. What was the outcome?

- e. How did you feel about the outcome?
 - i. Why?
 - f. How did it affect you?
 - g. In light of that experience, do you feel that our system of civil justice is fair?
 - h. In light of that experience, do you feel that our system of civil justice awards damages appropriately?
38. Have you ever served on a jury before?
- a. If so, what was the nature of the case, and did it go to verdict?
 - b. Was there anything about your jury experience that left you with any kind of feeling about the legal profession or court system?
39. Have you ever testified in a legal proceeding?
- a. If so, what were the circumstances?
 - b. How did you feel about that experience?

E. Attitudes about Damage Awards

40. Do you think people turn too readily to courts to resolve their problems?
- a. If so, why do you have such a belief?
41. Do you think it is appropriate to give people financial compensation for injuries they have suffered?

F. Views about Corporations

42. Do you feel that simply because an individual has sued a company that he is entitled to recover money?

- 43. Do you believe that if an employee complains about discriminatory practices to a manager or Human Resources, the employer is likely to react negatively and retaliate against that employee?
- 44. Do you have any negative views about JPMorgan Chase?
- 45. Do you have any negative views about companies on “Wall Street” or in the financial services industry?

G. General

- 46. Will you be able to follow my instructions on the law, even though you may personally disagree with those instructions or think that the law should be different?
- 47. Do you belong to any clubs, community organizations, or religious groups?
 - a. If so, which ones?
- 48. What books are you currently reading?
- 49. Do you regularly read any newspapers or magazines?
 - a. If so, which ones?
- 50. What television programs do you like to watch?
- 51. What web sites, if any, do you regularly visit?
- 52. If you were a party to this case expecting a fair trial, would you be willing to have a juror with your frame of mind sit on the jury?

53. Aside from the questions that have already been asked, is there anything else you believe that this Court, the plaintiff, or the defendant might want to know in deciding whether you should be selected to serve as a juror in this case?

Dated: New York, New York
September 24, 2012

Respectfully submitted,

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ENGELHARD, P.C.

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